



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

JMH  
F. #2019R00929

*271 Cadman Plaza East  
Brooklyn, New York 11201*

February 23, 2021

By ECF and USAFx

John Carman, Esq.  
666 Old Country Road  
Garden City, NY 11530  
Email: john@johncarmanlaw.com

Re: United States v. Baimadajie Angwang  
Criminal Docket No. 20-442 (EK)

Dear Mr. Carman:

Enclosed please find discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This production supplements the materials provided on December 23, 2020, and January 13, January 27, and February 4, 2021. See ECF Nos. 30, 34, 35, 38. The government also requests reciprocal discovery from the defendant.

The material enclosed is being produced to you subject to the discovery protective order entered by the Court on November 24, 2020. See ECF No. 28. The materials are being provided to you via the USAFx platform. Please contact me if you have any issues accessing the materials.

The document bearing Bates numbers ANGWANG-001557 through ANGWANG-001587 is a redacted copy of a "Questionnaire for National Security Positions," also known as an SF86, completed by the defendant on February 17, 2011. The documents bearing Bates numbers ANGWANG-001588 through ANGWANG-001597 are emails from May 17, 2019, associated with the defendant's submission of an SF-86C to maintain his security clearance.

Additional documents seized during the search of the defendant's residence are enclosed, bearing Bates numbers ANGWANG-001598 through ANGWANG-002287.

The document bearing Bates numbers ANGWANG-002288 through ANGWANG-002289 is a document located on one of the devices seized in the search of the defendant's premises, specifically, the device assigned inventory number "SC1." See

ANGWANG-000308 (inventory of devices). The document bearing Bates numbers ANGWANG-002290 through ANGWANG-002292 is a draft summary translation of this same document provided for your convenience. The government reserves the right to revise, amend, or replace this translation in advance of trial.

The folder bearing Bates number ANGWANG-002293 contains audio recordings involving the defendant. The file names of these audio recordings correspond to the draft transcripts previously produced to you on December 23, 2020. See ECF No. 30; see also, e.g., ANGWANG-000001 through -05 at 1, “Name of Audio File.”

The documents bearing Bates numbers ANGWANG-002294 through ANGWANG-002307 are surveillance photographs involving the defendant. Please note that the file names of these documents include information about the date on which each photograph was taken.

If you have any questions or requests regarding further discovery or a disposition of this matter, please do not hesitate to contact me.

Please be advised that, pursuant to the policy of the Office concerning plea offers and negotiations, no plea offer is effective unless and until made in writing and signed by authorized representatives of the Office. In particular, any discussion regarding the pretrial disposition of a matter that is not reduced to writing and signed by authorized representatives of the Office cannot and does not constitute a “formal offer” or a “plea offer,” as those terms are used in Lafler v. Cooper, 132 S. Ct. 1376 (2012), and Missouri v. Frye, 132 S. Ct. 1399 (2012).

Very truly yours,

SETH D. DUCHARME  
Acting United States Attorney

By: /s/ J. Matthew Haggans  
J. Matthew Haggans  
Assistant U.S. Attorneys  
(718) 254-7000

Enclosures (via USAFx)

cc: Clerk of the Court (EK) (by ECF) (without enclosures)